


EXHIBIT “B”

From: GARY LIGHTMAN garylighman@lightmanlaw.com 
Subject: Fwd: Activity in Case 2:22-cv-00688-JMY AMERICAN ENVIRONMENTAL ENTERPRISES INC., D/B/A THESAFTYHOUSE.COM v. MANFRED STERNBERG, et al Order on Motion to Compel
Date: April 11, 2024 at 11:42 AM
To: Pat Healey phealey@rebarkelly.com
Cc: Kim DiTomaso kditomaso@lightmanlaw.com, Glenn Manochi gmanochi@lightmanlaw.com, GARY LIGHTMAN itag8r@me.com

Patrick,

Yesterday when we spoke you told me that you needed more time to comply with Judge Younger's 4/1/24 Order Compelling Discovery from the Zekaria Defendants.

We are willing to provide your clients one additional week, through April 17, 2024, for the Zekaria Defendants to produce full and complete answers to the Interrogatories and to the Document Requests (without objection), and to produce all remaining responsive documents, PROVIDED HOWEVER, that you email us — TODAY — with the retainer/escrow agreement that Daphna created on February 6, 2022 (referred to in her WhatsApp text transcripts marked as DZ Deposition Exhibit-9).

Please email us that document, today, if you want the extra one week extension.

thx
Gary Lightman
cell 215-760-3000

Begin forwarded message:

From: GARY LIGHTMAN <garylighman@lightmanlaw.com>
Subject: Fwd: Activity in Case 2:22-cv-00688-JMY AMERICAN ENVIRONMENTAL ENTERPRISES INC., D/B/A [THESAFTYHOUSE.COM](https://thesafetyhouse.com) v. MANFRED STERNBERG, et al Order on Motion to Compel
Date: April 1, 2024 at 10:43:56 AM EDT
To: Pat Healey <phealey@rebarkelly.com>
Cc: Cathleen Kellv Rebar <crebar@rebarkellv.com>. "Laver. Seth L."

<slaver@goldbergsegalla.com>, Joseph Ross
<jross@goldbergsegalla.com>, Gary Weiss
<wgary4109@gmail.com>, sam gross
<charltonholdinggroupllc@aol.com>, Sam Gross
<Scg1212@gmail.com>, Sam Gross <samrosinc@icloud.com>,
Glenn Manochi <gmanochi@lightmanlaw.com>, Kim DiTomaso
<kditomaso@lightmanlaw.com>, GARY LIGHTMAN
<itag8r@me.com>

Patrick,

You are hereby served with the Order compelling discovery from the Zekaria Defendants, entered by Judge Younge today in the above-referenced case.

This will confirm that during our phone call of earlier today, we requested that Daphna Zekaria bring with her to her deposition tomorrow, at a minimum: (1) the retainer agreement that Gary Weiss testified to during his deposition, and (2) all of the bank records for her attorney escrow account (including the unredacted ones you produced, as well as the other missing bank records).

thx
Gary Lightman
cell 215-760-3000

attachment (1)

KDT—pls dy 4/10 ddln for Zekaria to produce all of the other discovery tg

Begin forwarded message:

From: ecf_paed@paed.uscourts.gov <ecf_paed@paed.uscourts.gov>

Sent: Monday, April 1, 2024 9:03 AM

To: paedmail@paed.uscourts.gov

Subject: Activity in Case 2:22-cv-00688-JMY AMERICAN ENVIRONMENTAL ENTERPRISES INC., D/B/A [THESAFETYHOUSE.COM](https://www.thesafetyhouse.com) v. MANFRED STERNBERG, et al Order on Motion to Compel

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United States District Court

Eastern District of Pennsylvania

Notice of Electronic Filing

The following transaction was entered on 4/1/2024 at 9:03 AM EDT and filed on 4/1/2024

Case Name: AMERICAN ENVIRONMENTAL ENTERPRISES INC., D/B/A
[THESAFETYHOUSE.COM](https://thesafetyhouse.com) v. MANFRED STERNBERG, et al

Case Number: [2:22-cv-00688-JMY](https://ecf.edpa.uscourts.gov/cases/2:22-cv-00688-JMY)

Filer:

Document
Number: [158](#)

Docket Text:

ORDER THAT PLAINTIFFS MOTION TO COMPEL DISCOVERY FROM DEFENDANTS DAPHNA ZEKARIA, ESQUIRE, AND SOKOLSKI & ZEKARIA, P.C., AND AWARDING SANCTIONS IS GRANTED. WITHIN TEN (10) DAYS OF THE DATE HEREOF, EACH OF THE ZEKARIA DEFENDANTS SHALL DELIVER TO PLAINTIFF FULL AND COMPLETE VERIFIED ANSWERS TO PLAINTIFFS INTERROGATORIES ADDRESSED TO THEM, WITHOUT OBJECTIONS. WITHIN TEN (10) DAYS OF THE DATE HEREOF, EACH OF THE ZEKARIA DEFENDANTS SHALL PRODUCE AND DELIVER TO

PLAINTIFF THEIR WRITTEN RESPONSES TOGETHER WITH ALL DOCUMENTS RESPONSIVE TO PLAINTIFFS REQUESTS FOR PRODUCTION OF DOCUMENTS ADDRESSED TO THEM, WITHOUT OBJECTIONS. SIGNED BY DISTRICT JUDGE JOHN M. YOUNGE ON 4/1/24.4/1/24 ENTERED AND COPIES E-MAILED.(amas)

2:22-cv-00688-JMY Notice has been electronically mailed to:

GARY P. LIGHTMAN garylighman@lightmanlaw.com, gmanochi@lightmanlaw.com, kditomaso@lightmanlaw.com

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JASON S. KANER (Terminated) Jason.Kaner@jacksonlewis.com, jason-kaner-2909@ecf.pacerpro.com, philadelphiadocketing@jacksonlewis.com

Joseph Ross jross@goldbergsegalla.com, efilings.philly@kiernantrebach.com, jmuller@goldbergsegalla.com, joeross@recap.email

2:22-cv-00688-JMY Notice will not be electronically mailed to:

ASOLARDIAMOND, LLC

GARY WEISS
680 EVERGREEN PKWY
UNION, NJ 07083

Gary Weiss

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=4/1/2024] [FileNumber=19549175-0]
] [28d58afb76d41bb956fb1cfc365f9c1f765b5d7a47b8de1794c0d1e5bd7320eecf1

93049f42769502b58b929052f05746890975906d61af921a37c6ba97e1ea8]]



Doc 158 Judge
Younge...24.pdf

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Gary Lightman, Esquire
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